

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION

ERICK LILES,

Plaintiff,

vs.

STEVE GOODWIN LOGGING, INC.,  
RANDY RAY BAILEY AND RANDY  
BAILEY TRUCKING CO., LLC,

Defendants.

Civil Action No. \_\_\_\_\_

**NOTICE OF REMOVAL**

TO: FREDERICK I. HALL, III, ATTORNEY FOR PLAINTIFF:

YOU WILL PLEASE TAKE NOTICE that the Defendants, Steve Goodwin Logging, Inc., Randy Ray Bailey and Randy Bailey Trucking Co., LLC, remove the above-captioned case from the Circuit Court of Darlington County, South Carolina, into the United States District Court, District of South Carolina, Florence Division. This removal is proper on the following grounds:

1. A civil action has been commenced and is now pending in the Circuit Court of Darlington County, State of South Carolina, styled *Erick Liles v. Steve Goodwin Logging, Inc., Randy Ray Bailey and Randy Bailey Trucking Co., Inc.*, Civil Action Number 2022CP1600211.

2. This action is one in which the United States District Courts have original jurisdiction, because the action involves a controversy which is wholly between citizens of different states. Upon information and belief, the Plaintiff was at the time of the commencement of this action, and still is, a citizen of the State of South Carolina. The Defendants were at the time of the commencement of this action, and still are, a citizen and/or headquartered in the State of North Carolina.

3. The Defendants are entitled to removal of the aforesaid action to this Court because complete diversity of citizenship exists between the Plaintiff and the Defendant and the amount in the controversy exceeds the jurisdictional amount required by 28 U.S.C. § 1332. In particular, Plaintiff demanded in excess of the jurisdictional amount of \$75,000.00 prior to suit being filed. Further, Plaintiff has not stipulated his damages. Finally, Plaintiff pled that he is entitled to punitive damages, and if successful, S.C. Code Ann. § 15-32-530 (A) provides that the Plaintiff would be entitled to the greater of three times the compensatory damages awarded or \$500,000.00. For all these reasons, the amount in controversy exceeds the jurisdictional amount.

4. This action was commenced by service of the Summons and Complaint, attached hereto as Exhibit A. Pursuant to 28 U.S.C. § 1446, this Notice of Removal is filed within thirty (30) days of service upon the Defendants of the initial pleadings setting forth the claim upon which relief is requested. These Defendants will serve an Answer or responsive pleading as provided by law.

5. The Honorable Scott B. Suggs, Clerk of Court of Darlington County, has been provided a copy of this Notice of Removal.

WHEREFORE, the Defendants give notice that the aforesaid action is removed from the Circuit Court of Darlington County, State of South Carolina, and to this Court for trial and determination.

***(Space Intentionally Left Blank—Signature Page to Follow)***

MCANGUS GOUDELOCK & COURIE, L.L.C.

*s/George C. James, III*

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